



Carol Teixeira
Manager, NY Electric Pricing

December 3, 2019

Honorable Michelle Phillips, Secretary
State of New York
Public Service Commission
Office of the Secretary, 19th Floor
Three Empire State Plaza
Albany, New York 12223-1350

RE: Case 15-E-0751 – In the Matter of the Value of Distributed Energy Resources (VDER)

Dear Secretary Phillips:

The enclosed tariff amendments, issued by Niagara Mohawk Power Corporation d/b/a National Grid (the “Company”), are being transmitted as a supplemental filing in compliance with the December 13, 2018 *Order Implementing Hybrid Energy Storage System Tariff* issued by the New York State Public Service Commission (“Commission”) in the above case number (“Order”).

Identification of Tariff Amendments:

Second Revised Leaf No. 415
Original Leaf No. 415.1
Third Revised Leaf No. 419

To P.S.C. No. 220 Electricity

Effective: December 9, 2019

At the time of filing the Order’s compliance tariff leaves, the Company interpreted the Order to imply that standby rates should be applicable to Hybrid Facilities (*i.e.*, energy storage systems paired with qualifying generating equipment) under VDER Value Stack compensation unless the projects are eligible for an exemption per the current tariff. The Company included revisions to tariff leaf 419 under Service Classification No. 7 (“S.C.7”) to clarify that standby rates will apply to these Hybrid Facilities. After further discussion with New York State Department of Public Service Staff and the other investor-owned utilities, it was decided that Hybrid Facilities should not be required to take service under S.C.7 but rather be allowed to take service under their otherwise applicable service classification. This supplemental tariff filing removes the standby requirement for Hybrid Facilities.

Ordering Clause No. 1 of the Order directed utilities to file tariff amendments on no less than five days’ notice with these supplemental leaves effective on December 9, 2019. Ordering Clause No. 2 of the Order waived the requirements of PSL §66 (12) (b) and 16 NYCRR §720-8.1 concerning newspaper publication of tariff amendments.

Attachment 1 contains the Company's redlined tariff leaves showing where the changes to the above leaves have occurred. Please advise the undersigned of any action taken regarding this filing.

Respectfully submitted,

/s/ Carol Teixeira

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Enc.

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